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February 24, 2025

Via Electronic Filing

The Honorable Eric R. Komitee  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom: 6G North  
Brooklyn, New York 11201

Re: Edmondson, et al. v. Raniere, et al.,  
1:20-cv-00485-EK-CLP

Dear Judge Komitee,

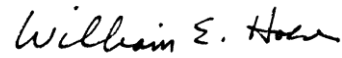
We write in response to Mr. Sullivan's letter asking the Court to postpone the scheduled March 10, 2025 conference for nearly a month because he may be on trial. Ordinarily we would agree to accommodate opposing counsel, but under the circumstances Plaintiffs believe that the scheduled conference should not be delayed. As the Court indicated at the last conference, it is important to continue the movement of the case forward, and Ms. Bronfman is not only represented by Mr. Sullivan but also by Aidala, Bertuna & Kamins, P.C.

With respect to discovery, the parties intend to meet this week to negotiate a discovery plan, which would then have been discussed with Magistrate Judge Pollack at the scheduled March 5 discovery conference and possibly with Your Honor on March 10. However, at Mr. Sullivan's request made last night, Judge Pollack postponed the discovery conference until April 3. Plaintiffs intend to ask Judge Pollack to reconsider and reinstate the March 5 conference date for the reasons set forth above. If that is not possible, we ask this Court to authorize the parties to serve written discovery requests without a discovery plan in place.

February 24, 2025

Plaintiffs therefore respectfully request that the Court deny Mr. Sullivan's motion to postpone the scheduled March 10 conference until after April 1 and, if the discovery conference is delayed until April 3, to authorize the parties to serve written discovery requests before the entry of a discovery plan.

Respectfully yours,

A handwritten signature in cursive script that reads "William E. Hoese".

William E. Hoese

WEH:jmk